

**Objection Deadline: November 16, 2023**

BURNS BAIR LLP

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*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:  
THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11  
Case No. 20-12345 (MG)

**THIRTY-FIFTH MONTHLY FEE STATEMENT OF BURNS BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors</u>
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	<u>September 1, 2023 – September 30, 2023</u>
Amount of Compensation sought as actual, reasonable, and necessary:	<u>\$182,575.75</u> <u>80% of which is \$146,060.60</u>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$16,761.44</u>
TOTAL (80% of fees and 100% of costs)	<u>\$162,822.04</u>

**This is the thirty-fifth monthly fee statement.**

**PRELIMINARY STATEMENT**

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this thirty-fifth monthly statement (the “Monthly Statement”) for the period from September 1, 2023 through September 30, 2023 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests interim allowance and payment of compensation in the amount of \$146,060.60 (80% of \$182,575.75) for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair, and (b) reimbursement of actual and necessary costs and expenses in the amount of \$16,761.44.

**FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975.00	75.40	\$73,515.00
Timothy Burns – Travel				\$487.50	19.20	\$9,360.00
Jesse Bair	Partner	2020	2013	\$625.00	85.20	\$53,250.00
Jesse Bair – Travel				\$312.50	21.50	\$6,718.75
Nathan Kuenzi	Associate	N/A	2020	\$420.00	23.10	\$9,702.00
Brian Cawley	Associate	N/A	2020	\$420.00	69.70	\$29,274.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	.70	\$252.00
Karen Dempksi	Paralegal	N/A	N/A	\$360.00	1.40	\$504.00
				<b>TOTAL:</b>	<b>296.20</b>	<b>\$182,575.75</b>

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

**EXPENSES INCURRED DURING THE STATEMENT PERIOD**

3. Set forth below is a categorical list of expenses incurred by Burns Bair during the Statement Period in the course of representing the Committee.

<b>Date</b>	<b>Description</b>	<b>Amount</b>
9/11/2023	United Airlines, T. Burns (MSN-EWR Sept. 11- 13)	\$832.40
9/11/2023	Delta Airlines, J. Bair (MSN-LGA Sept. 11-12)	\$976.40
9/17/2023	Uber, T. Burns (airport to hotel)	\$175.78
9/17/2023	Delta Airlines, J. Bair (MSN-LGA, Sept. 17-21)	\$967.10
9/17/2023	Hotel, T. Burns (3 nights)	\$2,181.00
9/17/2023	Travel meal, T. Burns	\$8.73
9/17/2023	United Airlines, T. Burns (MSN-EWR, Sept. 17- 22)	\$701.95
9/17/2023	Travel meal, J. Bair	\$15.91
9/17/2023	Hotel, J. Bair (3 nights)	\$2,181.00
9/18/2023	Travel meal, T. Burns	\$11.90
9/18/2023	Travel meal, T. Burns	\$1.50
9/18/2023	Travel meal, J. Bair	\$9.19
9/18/2023	Travel meal, J. Bair	\$16.28
9/18/2023	Travel meal, T. Burns	\$5.84
9/18/2023	Taxi, J. Bair and T. Burns	\$62.71
9/18/2023	Travel meal, T. Burns	\$2.62
9/19/2023	Travel meal, J. Bair	\$18.32
9/19/2023	Travel meal, T. Burns	\$18.84
9/19/2023	Travel meal, J. Bair	\$20.71
9/19/2023	Travel meal, J. Bair	\$5.63
9/19/2023	Travel meal, T. Burns	\$9.79
9/19/2023	Travel meal, T. Burns	\$4.12
9/19/2023	Travel meal, T. Burns	\$12.00
9/19/2023	Airport parking, J. Bair	\$28.00
9/19/2023	Uber, T. Burns (mediation to airport)	\$97.84
9/19/2023	Uber, J. Bair (mediation to airport)	\$157.29
9/20/2023	Delta Airlines Wi-Fi Onboard, J. Bair	\$15.95
9/20/2023	Uber, T. Burns	\$117.40

9/25/2023	Delta, J. Bair (MSN-LGA, Sept. 25-28)	\$1,217.80
9/25/2023	Hotel, J. Bair (3 nights)	\$2,409.00
9/25/2023	Taxi, J. Bair (airport to hotel)	\$93.35
9/25/2023	United Airlines, T. Burns (MSN-EWR, Sept. 25- 28)	\$1,049.80
9/25/2023	Hotel, T. Burns (3 nights)	\$2,409.00
9/25/2023	Travel meal, T. Burns	\$4.49
9/25/2023	Travel meal, J. Bair	\$22.76
9/25/2023	Uber, T. Burns (airport to hotel)	\$140.84
9/25/2023	Delta Airlines Wi-Fi Onboard, J. Bair	\$4.95
9/26/2023	Travel meal, J. Bair	\$20.90
9/26/2023	Travel meal, J. Bair	\$27.71
9/26/2023	Travel meal, T. Burns	\$19.54
9/26/2023	Uber, J. Bair and T. Burns (hotel to courthouse)	\$31.63
9/26/2023	FedEx pkg. to T. Burns (binder)	\$159.42
9/27/2023	Airport parking, T. Burns	\$30.00
9/27/2023	Travel meal, T. Burns	\$26.72
9/27/2023	Uber, T. Burns (hotel to airport)	\$173.84
9/27/2023	Travel meal, T. Burns	\$24.36
9/27/2023	Uber, J. Bair (hotel to airport)	\$167.68
9/27/2023	Airport parking, J. Bair	\$30.00
9/27/2023	Travel meal, J. Bair	\$25.50
9/28/2023	Delta Airlines, Wi-Fi Onboard, J. Bair	\$15.95
	<b>TOTAL:</b>	<b>\$16,761.44</b>

### **NOTICE AND OBJECTION PROCEDURES**

4. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

5. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by November 16, 2023 (the “Objection Deadline”) setting forth the nature of the objection and the amount of fees or expenses at issue.

6. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 80% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: October 31, 2023

BURNS BAIR LLP

/s/ Timothy W. Burns

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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

**EXHIBIT A**

## Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Official Committee of Unsecured Creditors of  
The Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 10/26/2023

**Bill # :** 01265

**Matter:** Insurance

### PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/1/2023	Brian Cawley	Continue analyzing Camden Plan opinion in connection with DRVC case (1.3); analyze Camden 9019 opinion in connection with DRVC case (1.4);	2.70	\$1,134.00
9/1/2023	Jesse Bair	Conference with T. Burns re case developments and projects (.4);	0.40	\$250.00
9/1/2023	Timothy Burns	Review and revise motion for relief from stay in light of J. Stang's comments (1.3); participate in call with state court counsel re same (.4); review and consider changes re motion for partial summary judgment on LMI/Interstate consent to settle issue (.8); participate in conference with J. Bair re case insurance developments and projects (.4);	2.90	\$2,827.50
9/1/2023	Brian Cawley	Correspondence with T. Burns and J. Bair regarding Committee joinder and insurance motions for relief from stay (.3); review co-counsel comments on the Committee's lift stay joinder (.3);	0.60	\$252.00
9/1/2023	Nathan Kuenzi	Research deliberative process privilege and other potential governmental privileges in connection with Arrowood 2004 motion (3.0);	3.00	\$1,260.00
9/1/2023	Nathan Kuenzi	Draft email memorandum on deliberative process privilege and related privileges for T. Burns in connection with Arrowood 2004 motion (2.8);	2.80	\$1,176.00
9/1/2023	Jesse Bair	Brief review re draft partial summary judgment motions against LMI and Interstate re lack of consent to settle provisions (.2); correspondence with PSZJ re same (.1);	0.30	\$187.50

9/2/2023	Timothy Burns	Continue reviewing and revising insurance motion for relief from stay in light of J. Stang's comments (4.1); correspondence with J. Bair re same (.1) ;	4.20	\$4,095.00
9/2/2023	Jesse Bair	Correspondence with T. Burns re motion to lift the stay to send insurance demands (.1);	0.10	\$62.50
9/3/2023	Brian Cawley	Analyze additional comments from PSZJ re the Committee's lift stay joinder (.2);	0.20	\$84.00
9/3/2023	Jesse Bair	Correspondence with B. Cawley and T. Burns re motion to lift stay revisions (.1);	0.10	\$62.50
9/3/2023	Timothy Burns	Finalize draft of the Committee's motion for relief from stay joinder (2.2);	2.20	\$2,145.00
9/3/2023	Brian Cawley	Correspondence with J. Bair regarding Committee lift stay joinder, Burns declaration, and related exhibits (.2);	0.20	\$84.00
9/4/2023	Jesse Bair	Correspondence with T. Burns re Arrowood Rule 2004 hearing preparations (.1);	0.10	\$62.50
9/4/2023	Timothy Burns	Analyze information regarding the Diocese Plan Term Sheet and Plan Support Agreement (.4);	0.40	\$390.00
9/4/2023	Brian Cawley	Revise and edit the Committee's insurance lift stay joinder (1.6); revise and edit Burns declaration to same (.5); identify and prepare exhibits to same (.7);	2.80	\$1,176.00
9/4/2023	Nathan Kuenzi	Research and identify relevant case law in connection with upcoming hearing on the Committee's Arrowood Rule 2004 motion (1.5);	1.50	\$630.00
9/4/2023	Timothy Burns	Review memo re deliberative process privilege in connection with Arrowood 2004 motion (.4); review agenda for September 6 hearing (.1); review Debtor's reply in support of 16th omnibus claims objection (.3); review Evanston's response to the Committee's Section 3420 notice letter (.1); review and analysis of notes re Interstate counter and potential response to same (.2);	1.10	\$1,072.50
9/4/2023	Nathan Kuenzi	Correspondence with T. Burns re Arrowood guarantee fund issues (.1);	0.10	\$42.00
9/5/2023	Jesse Bair	Review and edit current draft of the Committee's joinder and memorandum of law in support of certain survivors' motion to lift the stay (.4); review and edit Burns declaration and related exhibits (.2); correspondence with B. Cawley re additional edits needed to same (.2); conference with B. Cawley re same (.2);	1.00	\$625.00



9/5/2023	Brian Cawley	Participate in conference with J. Bair re edits needed to the Burns lift stay declaration (.2); analyze discovery status letters in the insurance adversary proceedings re representations re scope of Diocesan document productions in connection with lift stay issues (.9); create discovery status letter exhibits for Burns declaration (.3); update Burns declaration to reflect new exhibits (.4); correspondence with J. Bair re revised Burns declaration (.1);	1.90	\$798.00
9/5/2023	Brian Cawley	Draft proposed orders granting the individual motions to lift stay to send insurance demands (.5);	0.50	\$210.00
9/5/2023	Nathan Kuenzi	Analyze Burns Bair interim application and related materials in preparation for upcoming fee hearing (.8);	0.80	\$336.00
9/5/2023	Jesse Bair	Prepare for Committee meeting (.2); participate in Committee meeting for insurance purposes re case strategy, status, and insurance initiatives (1.3);	1.50	\$937.50
9/5/2023	Brian Cawley	Revise and edit draft motion to lift stay, proposed orders, and insurance demand letters for each state court counsel group (.6); correspond with J. Bair re same (.2);	0.80	\$336.00
9/5/2023	Jesse Bair	Identify relevant materials for use during upcoming fee hearing (.2); provide instructions to T. Burns and N. Kuenzi re same and hearing issues (.2);	0.40	\$250.00
9/5/2023	Jesse Bair	Review most recent version of the lift stay motions in order to send insurance demands letters (.3); various correspondence with numerous state court counsel re same (.4); correspondence with K. Dine and B. Michael re hearing date and briefing schedule re same (.1);	0.80	\$500.00
9/5/2023	Jesse Bair	Brief review re Arrowood's objection to the Committee's Rule 2004 motion (.2);	0.20	\$125.00
9/5/2023	Brian Cawley	Finalize motions for relief from stay, the Committee's joinder re same, Burns declaration, related exhibits, and insurance demand letters (1.6); correspondence with J. Bair re revised versions of same (.2);	1.80	\$756.00
9/5/2023	Brian Cawley	Revise and edit Burns lift stay declaration to incorporate partner edits (.2); review case materials for potential additional exhibits to same (.3); correspond with J. Bair regarding revised Burns declaration and exhibits (.1);	0.60	\$252.00

9/5/2023	Jesse Bair	Brief review re current drafts of motions for partial summary judgment against LMI and Interstate re lack of consent to settle provisions (.2); correspondence with state court counsel re same (.2);	0.40	\$250.00
9/5/2023	Brian Cawley	Analyze recent filings in Delaware mandamus insurance action (.6); draft summary of recent Arrowood Delaware filings for T. Burns and J. Bair (.3);	0.90	\$378.00
9/6/2023	Jesse Bair	Review updated Claro valuation and insurance allocation figures in connection with upcoming mediation sessions (.3);	0.30	\$187.50
9/6/2023	Jesse Bair	Conference with N. Kuenzi re outcome of 9/6/23 omnibus hearing (.1);	0.10	\$62.50
9/6/2023	Jesse Bair	Analyze Arrowood's objection to the Committee's 2004 Motion and begin drafting outline of the Committee reply brief (1.2);	1.20	\$750.00
9/6/2023	Brian Cawley	Analyze Second Circuit case law re the pending proceeding rule and related doctrines in connection with drafting the Committee's reply to Arrowood's 2004 opposition (2.2); draft summary of research for J. Bair (.5); discuss research with J. Bair (.2);	2.90	\$1,218.00
9/6/2023	Nathan Kuenzi	Participate in conference with J. Bair re outcome of 9/6/23 omnibus hearing (.1);	0.10	\$42.00
9/6/2023	Jesse Bair	Correspondence with B. Michael and state court counsel re call to discuss lift stay motion issues (.1);	0.10	\$62.50
9/6/2023	Jesse Bair	Answer questions from state court counsel re proposed insurance demand letters (.2);	0.20	\$125.00
9/6/2023	Jesse Bair	Analysis re case law research needed in connection with responding to Arrowood's objection to the Committee's 2004 motion (.2); provide instructions to B. Cawley re same (.2); analysis re B. Cawley research results re same (.2); correspondence with B. Cawley re supplemental research needed in connection with the Committee's Rule 2004 reply brief (.1);	0.70	\$437.50
9/6/2023	Nathan Kuenzi	Continue analyzing BB fee materials in preparation for upcoming fee hearing (1.4);	1.40	\$588.00
9/6/2023	Jesse Bair	Correspondence with K. Dine re hearing date issues in connection with forthcoming motions to lift the stay in order to send insurance demands (.1);	0.10	\$62.50
9/6/2023	Jesse Bair	Preliminary review re the Diocese's proposed settlement term sheet (.1); correspondence with PSZJ re call with Diocese to discuss same (.1);	0.20	\$125.00

9/6/2023	Brian Cawley	Research discoverability of reserve information, claim file information, other insured settlements, and related issues in connection with the Committee's reply to Arrowood's Rule 2004 objection (2.4); draft summary of research and send to J. Bair (.8);	3.20	\$1,344.00
9/6/2023	Jesse Bair	Analyze the Diocese of Camden order denying plan confirmation in connection with ongoing plan negotiations in the DRVC case (1.0);	1.00	\$625.00
9/6/2023	Nathan Kuenzi	Participate in conference with J. Bair re upcoming omnibus hearing (.1); continue preparing for same (.2);	0.30	\$126.00
9/6/2023	Jesse Bair	Conference with N. Kuenzi re preparations for 9/6/23 omnibus hearing (.1);	0.10	\$62.50
9/6/2023	Nathan Kuenzi	Draft summary of outcome of 9/6/23 fee and omnibus hearing (.2);	0.20	\$84.00
9/6/2023	Timothy Burns	Review correspondence with BB and state court counsel re insurance motion for relief from stay (.2); review N. Kuenzi's summary of September 6 hearing outcome (.1); review notice re amended hearing re derivative standing motion (.1); review correspondence with BB and PSZJ re motion for relief issues (.1);	0.50	\$487.50
9/6/2023	Nathan Kuenzi	Participate in September 6 fee and omnibus hearing (1.5);	1.50	\$630.00
9/6/2023	Brian Cawley	Review correspondence from state court counsel re motion for relief from stay issues (.2);	0.20	\$84.00
9/7/2023	Jesse Bair	Review correspondence with K. Dine and the court re motion to lift stay hearing date (.1);	0.10	\$62.50
9/7/2023	Jesse Bair	Prepare for call with certain state court counsel re case insurance initiatives (.1); participate in call with certain state court counsel re same and upcoming motion to lift stay filing (.5);	0.60	\$375.00
9/7/2023	Jesse Bair	Participate in initial team strategy meeting with PSZJ team for insurance purposes re upcoming meeting with the Diocese re draft settlement term sheet and upcoming mediation session (.2); participate in follow-up team strategy meeting with PSZJ for insurance purposes re same (.3);	0.50	\$312.50
9/7/2023	Brian Cawley	Correspondence with state court counsel re proposed orders granting motions to lift the stay (.2);	0.20	\$84.00
9/7/2023	Brian Cawley	Prepare exhibits to the Committee's Rule 2004 reply brief (.2);	0.20	\$84.00
9/7/2023	Jesse Bair	Review correspondence from the mediators re Lexington counter (.1); correspondence with T. Burns re potential response to same (.1);	0.20	\$125.00

9/7/2023	Jesse Bair	Participate in meeting with the Diocese re the Diocese's proposed settlement term sheet (1.1);	1.10	\$687.50
9/7/2023	Jesse Bair	Conference with T. Burns re insurance strategy for upcoming mediation sessions (.1);	0.10	\$62.50
9/7/2023	Brian Cawley	Review and edit the motions to lift stay to incorporate new hearing and objection deadlines (.3);	0.30	\$126.00
9/7/2023	Brian Cawley	Prepare for call with certain state court counsel re case insurance initiatives (.2); participate in call with certain state court counsel re same and upcoming motion to lift stay filing (.5);	0.70	\$294.00
9/7/2023	Jesse Bair	Correspondence with B. Cawley re additional research needed in connection with the Committee's Rule 2004 reply brief (.1);	0.10	\$62.50
9/7/2023	Jesse Bair	Correspondence with B. Cawley re additional edit needed to the motions to lift stay (.1);	0.10	\$62.50
9/7/2023	Nathan Kuenzi	Analyze additional issues relating to potential privilege arguments Arrowood may raise in connection with the Committee's Rule 2004 motion (.8); correspondence with J. Bair re same (.2);	1.00	\$420.00
9/7/2023	Brian Cawley	Research and analyze case law re examples of Rule 2004 examinations of insurance companies and scope of same (2.5) ;draft summary of case law for J. Bair (.4);	2.90	\$1,218.00
9/7/2023	Jesse Bair	Review K. Dine's suggested edits to the insurance demand letters (.1); correspondence with B. Cawley re same (.1);	0.20	\$125.00
9/7/2023	Jesse Bair	Draft the Committee's reply brief in support of its Rule 2004 motion (5.1);	5.10	\$3,187.50
9/7/2023	Jesse Bair	Analyze case law research in connection with the Committee's Rule 2004 reply brief (.7);	0.70	\$437.50
9/7/2023	Brian Cawley	Correspond with J. Bair regarding revised language for insurance demand letters (.2);	0.20	\$84.00
9/7/2023	Jesse Bair	Draft Bair declaration and related exhibit in support of the Committee's Rule 2004 reply brief (.3);	0.30	\$187.50
9/7/2023	Brian Cawley	Correspond with each state court counsel group re revised motions for relief from stay (1.0);	1.00	\$420.00
9/7/2023	Nathan Kuenzi	Analyze Rule 2004 materials, exhibits, and relevant case law to identify key documents for use in preparing for Rule 2004 hearing (2.3);	2.30	\$966.00
9/8/2023	Nathan Kuenzi	Conference with T. Burns re Guarantee Fund issues in connection with ongoing Plan negotiations (.2);	0.20	\$84.00
9/8/2023	Jesse Bair	Edit and finalize the Committee's Rule 2004 reply brief, Bair declaration, and related exhibits (.5); correspondence with PSZJ re same (.1);	0.60	\$375.00

9/8/2023	Jesse Bair	Conference with N. Kuenzi re Guarantee Fund issues in connection with ongoing Plan negotiations (.2); provide instructions to N. Kuenzi and B. Cawley re additional Guarantee Fund research needed in connection with ongoing Plan negotiations (.2); follow-up correspondence re same (.1);	0.50	\$312.50
9/8/2023	Jesse Bair	Review and respond to questions from state court counsel re lift stay motion and insurance demand letters (.2);	0.20	\$125.00
9/8/2023	Jesse Bair	Participate in call with T. Burns re outcome of meeting with Jones Day re the Diocese's proposed settlement term sheet (.2);	0.20	\$125.00
9/8/2023	Karen Dempski	Prepare hearing prep binders for Rule 2004 hearing against Arrowood (1.4);	1.40	\$504.00
9/8/2023	Jesse Bair	Review and incorporate K. Dine's suggested edits into the Committee's Rule 2004 reply brief (.2);	0.20	\$125.00
9/8/2023	Jesse Bair	Participate in call with state court counsel re potential Lexington response (.1);	0.10	\$62.50
9/8/2023	Brian Cawley	Research additional Guarantee Fund issues in connection with ongoing Plan negotiations, including potential set off arguments and per claim recovery (1.7);	1.70	\$714.00
9/8/2023	Brian Cawley	Revise and edit the Committee's Rule 2004 reply brief against Arrowood (1.5);	1.50	\$630.00
9/8/2023	Nathan Kuenzi	Participate in conference with J. Bair and B. Cawley re additional Guarantee Fund research needed in connection with ongoing Plan negotiations (.2);	0.20	\$84.00
9/8/2023	Brian Cawley	Discuss guaranty fund research project with J. Bair and N. Kuenzi (.2);	0.20	\$84.00
9/8/2023	Jesse Bair	Correspondence with B. Michael re potential response to Lexington's recent counter (.1);	0.10	\$62.50
9/8/2023	Nathan Kuenzi	Analyze necessity of Arrowood claim segregation in Plan in connection with recovery against New York Guarantee Fund (1.4); draft email memorandum for J. Bair re same (.2);	1.60	\$672.00
9/10/2023	Jesse Bair	Analysis re state court counsel's suggested edits to the motion to lift stay papers (.3); correspondence with state court counsel re same (.2);	0.50	\$312.50
9/10/2023	Brian Cawley	Implement partner edits into Burns declaration and Committee lift stay joinder (.5); correspondence with J. Bair re revised lift stay materials (.2); correspond with each state court counsel group re revised lift stay papers (.5);	1.20	\$504.00
9/10/2023	Jesse Bair	Review proposed orders granting certain survivors' motions to lift the stay (.1);	0.10	\$62.50

9/10/2023	Jesse Bair	Review and edit the Committee's joinder and memorandum of law in support of certain survivors' motion to lift the stay (.2);	0.20	\$125.00
9/10/2023	Jesse Bair	Correspondence with B. Cawley and T. Burns re additional edits needed to finalize the Committee's motion to lift stay papers (.2);	0.20	\$125.00
9/10/2023	Jesse Bair	Review and edit Burns Declaration and related exhibits in support of certain survivors' motion to lift the stay (.2);	0.20	\$125.00
9/11/2023	Jesse Bair	Review Settlement Conference Order for upcoming mediations (.1);	0.10	\$62.50
9/11/2023	Jesse Bair	Review and edit final version of the Committee lift stay joinder, Burns declaration, and related exhibits (.2); correspondence with PSZJ and B. Cawley re same, filing, and notice of hearing (.3);	0.50	\$312.50
9/11/2023	Timothy Burns	Review and respond to correspondence re adjournment of Rule 2004 hearing with PSZJ, J. Bair, and Arrowood (.2); participate in call with J. Bair re same (.1); participate in call with state court counsel re same (.1);	0.40	\$390.00
9/11/2023	Jesse Bair	Participate in call with particular state court counsel re lift stay motion and insurance demand letters (.4);	0.40	\$250.00
9/11/2023	Jesse Bair	Participate in call with different state court counsel re lift stay motions and insurance demand letters (.4);	0.40	\$250.00
9/11/2023	Jesse Bair	Correspondence with PSZJ re logistics for upcoming mediation sessions (.1);	0.10	\$62.50
9/11/2023	Jesse Bair	Review Committee correspondence with the mediators re Plan and settlement negotiations (.1); review correspondence with state court counsel re same (.1);	0.20	\$125.00
9/11/2023	Brian Cawley	Correspond with PSZJ regarding status of Committee lift stay joinder filing (.2); correspond with J. Bair regarding status of state court counsel lift stay motions and Committee joinder filings (.2); correspond with state court counsel regarding lift stay motion filings (.2);	0.60	\$252.00
9/12/2023	Jesse Bair	Analysis re insurer exposures in preparation for upcoming mediation session (.1);	0.10	\$62.50
9/12/2023	Jesse Bair	Analyze letter from the Diocese re the Committee's and state court counsel's lift stay motions (.2);	0.20	\$125.00
9/12/2023	Jesse Bair	Correspondence with T. Burns re potential Interstate and Lexington counters (.1);	0.10	\$62.50
9/12/2023	Jesse Bair	Analysis re potential additional insurance demand letters (.2); correspondence with state court counsel re same (.1);	0.30	\$187.50

9/12/2023	Jesse Bair	Participate in call with T. Burns re outcome of call with state court counsel re lift stay motions (.2);	0.20	\$125.00
9/12/2023	Brian Cawley	Continue researching additional Guarantee Fund issues in connection with ongoing Plan negotiations, including potential set off arguments and per claim recovery (2.3);	2.30	\$966.00
9/12/2023	Brian Cawley	Analyze potential new insurance demand letter claims (.6); draft email to J. Bair summarizing claim valuation and coverage for same (.3);	0.90	\$378.00
9/12/2023	Jesse Bair	Correspond with PSZJ re potential consent to settle partial summary judgment motion (.1);	0.10	\$62.50
9/12/2023	Timothy Burns	Review and respond to correspondence with PSZJ re upcoming mediation session (.2); review correspondence from BB team re Rule 2004 hearing (.1); brief review of emails and filings re motions for relief from stay (.2); review correspondence from PSZJ to mediators and related emails from state court counsel to Committee professionals re same (.2); correspondence with J. Bair re Interstate and Lexington counters (.1); participate in call with J. Bair re outcome of call with state court counsel re relief from stay motions (.2); review J. Bair correspondence re motions for partial summary judgment on consent to settle issue (.1); review correspondence with J. Bair and PSZJ re Interstate and Lexington counters (.1); review reply in support of motion to reconsider withdrawal of the reference (.2);	1.40	\$1,365.00
9/13/2023	Jesse Bair	Analysis re Debtor request for meet and confer re insurance demand lift stay motion (.1); correspondence with B. Michael re same, new lift stay hearing date, and insurer counters (.2);	0.30	\$187.50
9/13/2023	Brian Cawley	Complete additional research re Guarantee Fund issues in connection with ongoing Plan negotiations, including potential set off arguments and per claim recovery (3.4); draft summary of research for J. Bair (1.0);	4.40	\$1,848.00
9/14/2023	Jesse Bair	Correspondence with B. Michael re revised hearing date on the motion to lift stay (.1);	0.10	\$62.50
9/14/2023	Jesse Bair	Review correspondence with Jones Day and B. Michael re motion to lift stay meet and confer (.1);	0.10	\$62.50
9/14/2023	Jesse Bair	Review B. Michael summary re outcome of mediation session with Debtor (.1); review T. Burns and I. Nasatir correspondence re same (.1); draft responses to B. Michael question re insurance issues raised during session (.2);	0.40	\$250.00

9/14/2023	Timothy Burns	Review, analyze, and respond to PSZJ mediation update email re session with the Debtor and mediators (.5); additional correspondence with PSZJ and J. Bair re same (.3); review correspondence with PSZJ and the Debtor re meet and confer (.1); review correspondence with PSZJ and the Court re motions for relief from stay hearing (.1); review correspondence from LMI re motions for relief from stay hearing (.1); review K. Dine correspondence re mediation meeting (.1);	1.20	\$1,170.00
9/14/2023	Timothy Burns	Correspondence with J. Bair re case status and ongoing insurance projects (.1);	0.10	\$97.50
9/15/2023	Jesse Bair	Prepare for motion to lift stay meet and confer with the Diocese (.1); participate in motion to lift stay meet and confer with the Diocese (.6); participate in post-meeting call with T. Burns re outcome of same and next-steps (.2);	0.90	\$562.50
9/15/2023	Jesse Bair	Participate in conference with B. Cawley re case status, upcoming mediation, and research projects needed re motion to lift stay issues (.4);	0.40	\$250.00
9/15/2023	Timothy Burns	Participate in call with J. Bair re upcoming meet and confer with the Diocese and insurance mediation prep and strategy (.6);	0.60	\$585.00
9/15/2023	Timothy Burns	Prepare for motion to lift stay meet and confer with the Diocese (.4); participate in motion to lift stay meet and confer with the Diocese (.6); participate in post-meeting call with J. Bair re outcome of same and next-steps (.2);	1.20	\$1,170.00
9/15/2023	Jesse Bair	Review and respond to correspondence with LMI, B. Michael, and the Court re motion to lift stay hearing issues (.2);	0.20	\$125.00
9/15/2023	Jesse Bair	Participate in call with T. Burns re upcoming meet and confer with the Diocese and insurance mediation prep and strategy (.6);	0.60	\$375.00
9/15/2023	Brian Cawley	Participate in conference with J. Bair re case status, upcoming mediation, and research projects needed re motion to lift stay issues (.4); analyze case law previously cited by insurers purportedly supporting the proposition that insurance demands implicate the automatic stay (.7);	1.10	\$462.00
9/15/2023	Jesse Bair	Review monthly Diocesan PSIP information (.1);	0.10	\$62.50
9/15/2023	Jesse Bair	Identify relevant materials and provide instructions to K. Dempski re preparing insurance mediation prep binders (.2);	0.20	\$125.00
9/15/2023	Jesse Bair	Review Order regarding mediation logistics (.1);	0.10	\$62.50



9/15/2023	Jesse Bair	Analysis re Judge Glenn's parish preliminary injunction ruling and case law re automatic stay issues in connection with upcoming meet and confer with the Diocese (.4);	0.40	\$250.00
9/17/2023	Timothy Burns	Travel to New York from Madison for mediation [billed at 1/2 travel rate] (5.4);	5.40	\$2,632.50
9/17/2023	Jesse Bair	Travel to New York from Madison for mediation [billed at 1/2 travel rate] (6.1);	6.10	\$1,906.25
9/17/2023	Timothy Burns	Prepare for mediation by reviewing insurance binder materials (.8);	0.80	\$780.00
9/18/2023	Timothy Burns	Participate in conference with J. Bair re mediation preparation and insurance strategy (.4); participate in full day mediation session (9.1); participate in post-mediation discussion re mediation strategy with J. Bair (.2);	9.70	\$9,457.50
9/18/2023	Jesse Bair	Provide instructions to B. Cawley re edits needed to draft insurance demands (.1);	0.10	\$62.50
9/18/2023	Jesse Bair	Participate in full-day mediation session (9.1); participate in post-mediation discussion re mediation strategy with T. Burns (.2);	9.30	\$5,812.50
9/18/2023	Brian Cawley	Prepare materials for T. Burns review re derivative standing motion and forthcoming objection (.5);	0.50	\$210.00
9/18/2023	Brian Cawley	Prepare for mediation session (.3); participate in portion of mediation session via Zoom (4.7); summarize notes from mediation for partner review (.5);	5.50	\$2,310.00
9/18/2023	Brenda Horn-Edwards	Draft BB monthly fee statement (.6); generate and edit Exhibit A to same (.1);	0.70	\$252.00
9/18/2023	Jesse Bair	Participate in conference with T. Burns re mediation preparation and insurance strategy (.4);	0.40	\$250.00
9/18/2023	Brian Cawley	Draft additional insurance demand letter (.9); draft new language for insurance demand template (.2); update prior insurance demands with new language (.3); correspondence with J. Bair re revised insurance demand letters (.2);	1.60	\$672.00
9/19/2023	Timothy Burns	Participate in full-day mediation session (8.7);	8.70	\$8,482.50
9/19/2023	Jesse Bair	Return travel to Madison from New York mediation [billed at 1/2 travel rate] (5.6);	5.60	\$1,750.00
9/19/2023	Brian Cawley	Continue revising insurance demand letters (1.6);	1.60	\$672.00
9/19/2023	Timothy Burns	Begin preparing for Section 349 derivative standing hearing, including review of Camden 9019 decision and objections to the Committee's motion for derivative standing (1.6);	1.60	\$1,560.00
9/19/2023	Brian Cawley	Analyze Diocese Objection to Committee Section 349 derivative standing motion (.5); research case law relied upon by Diocese (1.5);	2.00	\$840.00

9/19/2023	Timothy Burns	Return travel to Madison from New York mediation [billed at 1/2 travel rate] (4.6);	4.60	\$2,242.50
9/19/2023	Jesse Bair	Participate in second day of mediation session (8.7);	8.70	\$5,437.50
9/19/2023	Brian Cawley	Participate in portion of day 2 of mediation session via Zoom (3.8); summarize mediation notes for partner review (.4);	4.20	\$1,764.00
9/20/2023	Brian Cawley	Research reliance requirement under Section 349 (2.5); draft summary of research for T. Burns and J. Bair (.7);	3.20	\$1,344.00
9/20/2023	Jesse Bair	Participate in call with T. Burns re motions for partial summary judgment drafts (.2);	0.20	\$125.00
9/20/2023	Jesse Bair	Participate in conference with B. Cawley re insurance next-steps and ongoing projects (.2); participate in additional conference with B. Cawley re additional research needed in connection with Committee derivative standing reply brief (.2);	0.40	\$250.00
9/20/2023	Jesse Bair	Participate in call with T. Burns re case insurance strategy, briefing, and next-steps re same (.4);	0.40	\$250.00
9/20/2023	Timothy Burns	Participate in call with J. Bair re case insurance strategy, briefing, and next-steps re same (.4); review briefing and outline key arguments re the Committee's Section 349 reply brief (2.3); participate in call with state court counsel re mediation (.2); review B. Cawley's research summary re reliance issue re section 349 claims (.2); participate in call with J. Bair re draft motions for partial summary judgment on consent to settle issue (.2); review J. Bair correspondence to Diocese re same (.1); review correspondence with J. Bair and the Diocese re derivative standing motion (.1);	3.50	\$3,412.50
9/20/2023	Jesse Bair	Analysis re logistics for upcoming insurance hearing and mediation sessions (.1);	0.10	\$62.50
9/20/2023	Jesse Bair	Review T. Burns' correspondence re key thoughts re responding to insurer and Diocese Section 349 derivative standing objection (.3);	0.30	\$187.50
9/20/2023	Timothy Burns	Review correspondence with PSZJ and J. Bair re Debtor's Plan concerns (.2); participate in call with J. Bair re same (.2);	0.40	\$390.00
9/20/2023	Brian Cawley	Discuss mediation outcome and next steps with J. Bair (.2);	0.20	\$84.00
9/20/2023	Brian Cawley	Research standing/ripeness issues for injunctive relief under Section 349 and other claims (3.4); draft summary of research for J. Bair in connection with the Committee's Section 349 derivative standing reply brief (1.0);	4.40	\$1,848.00

9/20/2023	Jesse Bair	Participate in additional conference with T. Burns re insurance Plan issues (.2);	0.20	\$125.00
9/20/2023	Jesse Bair	Begin drafting the Committee's Section 349 derivative standing reply brief (1.0);	1.00	\$625.00
9/20/2023	Jesse Bair	Review correspondence from the Diocese re insurance Plan issues (.1); correspondence with PSZJ and T. Burns re same (.1);	0.20	\$125.00
9/20/2023	Jesse Bair	Analyze the Diocese's response to the Committee's Section 349 derivative standing motion (.4); draft correspondence to the Diocese re same and potential resolution of motion (.4);	0.80	\$500.00
9/20/2023	Jesse Bair	Review and edit draft motions for partial summary judgment re consent to settle issue against LMI and Interstate (.4); draft correspondence to Diocese re demand to file same (.2); correspondence with PSZJ re same (.1);	0.70	\$437.50
9/20/2023	Nathan Kuenzi	Prepare for conference with J. Bair (.1); participate in conference with J. Bair re research needed re insurer administrative claim arguments in connection with the Committee's Section 349 derivative standing motion (.2);	0.30	\$126.00
9/20/2023	Nathan Kuenzi	Research case law re the insurers' administrative claim argument in connection with the Committee's Section 349 derivative standing motion (1.0);	1.00	\$420.00
9/20/2023	Jesse Bair	Provide instructions to N. Kuenzi re research needed re insurer administrative claim arguments (.2);	0.20	\$125.00
9/20/2023	Jesse Bair	Analyze the insurers' objection to the Committee's Section 349 derivative standing motion (.7);	0.70	\$437.50
9/21/2023	Brian Cawley	Review and edit the Committee's Section 349 derivative standing reply brief (1.8);	1.80	\$756.00
9/21/2023	Jesse Bair	Continue drafting the Committee's Section 349 derivative standing reply brief (5.9); correspondence with K. Dine re suggested edit to same (.1); participate in call with T. Burns re same (.2);	6.20	\$3,875.00
9/21/2023	Brian Cawley	Correspond with J. Bair and N. Kuenzi re Section 349 research question (.2);	0.20	\$84.00
9/21/2023	Nathan Kuenzi	Research issue as to whether violation of New York public policy constitutes a deceptive practice under Section 349 (.3);	0.30	\$126.00
9/21/2023	Timothy Burns	Participate in Zoom mediation session with the Diocese (3.0); participate in call with J. Bair re the Committee's Section 349 derivative standing reply brief (.2);	3.20	\$3,120.00

9/21/2023	Jesse Bair	Participate in portion of Zoom mediation session with the Diocese (2.0);	2.00	\$1,250.00
9/21/2023	Nathan Kuenzi	Analyze case law re approving settlement agreements under Rule 9019 and insurer administrative claims in connection with upcoming Section 349 derivative standing oral argument (2.5);	2.50	\$1,050.00
9/22/2023	Jesse Bair	Conference with T. Burns re derivative standing reply brief (.2);	0.20	\$125.00
9/22/2023	Nathan Kuenzi	Draft summary memorandum re insurer administrative claim issues in connection with upcoming Section 349 derivative standing oral argument (2.0);	2.00	\$840.00
9/22/2023	Jesse Bair	Begin preparing for Rule 2004 oral argument, including review of relevant case law (1.2);	1.20	\$750.00
9/22/2023	Jesse Bair	Edit and finalize the Committee's Section 349 derivative standing reply brief (.9); correspondence with PSZJ re same (.1);	1.00	\$625.00
9/22/2023	Jesse Bair	Review and respond to additional suggested edits from I. Nasatir re the Committee's Section 349 derivative standing reply brief (.2);	0.20	\$125.00
9/22/2023	Timothy Burns	Continue preparing for hearing on the Committee's Section 349 derivative standing motion (.8); conference with J. Bair re derivative standing reply brief (.2);	1.00	\$975.00
9/22/2023	Brian Cawley	Correspond with T. Burns regarding derivative standing hearing preparation materials (.2);	0.20	\$84.00
9/23/2023	Brian Cawley	Email J. Bair regarding status of Arrowood Delaware insurance action (.1);	0.10	\$42.00
9/23/2023	Timothy Burns	Review agenda for upcoming hearing (.1); review correspondence from K. Dine to mediators (.1); correspondence with J. Bair re same (.1); continue preparing for Section 349 derivative standing hearing (3.9);	4.20	\$4,095.00
9/23/2023	Brian Cawley	Prepare derivative standing hearing preparation materials for T. Burns (1.1);	1.10	\$462.00
9/23/2023	Jesse Bair	Continue preparing for Rule 2004 oral argument, including reviewing relevant case law, exhibits, and Delaware regulatory orders (3.0);	3.00	\$1,875.00
9/24/2023	Jesse Bair	Review the mediators' status report (.1);	0.10	\$62.50
9/24/2023	Timothy Burns	Continue preparing for Section 349 derivative standing hearing (4.2);	4.20	\$4,095.00
9/24/2023	Jesse Bair	Correspondence with T. Burns re Diocese's lack of response to email re potential resolution of Section 349 motion (.1);	0.10	\$62.50
9/24/2023	Jesse Bair	Continue preparing for Rule 2004 oral argument, including reviewing relevant case law, exhibits, and drafting outline re same (2.7);	2.70	\$1,687.50
9/24/2023	Jesse Bair	Review agenda for the 9/26 hearing (.1);	0.10	\$62.50

9/25/2023	Timothy Burns	Continue preparing for Section 349 derivative standing hearing (5.0); conference with J. Bair re same and Arrowood 2004 motion (.4);	5.40	\$5,265.00
9/25/2023	Jesse Bair	Travel to New York from Madison for insurance hearing and mediation [billed at 1/2 travel rate] (4.2);	4.20	\$1,312.50
9/25/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy for upcoming hearings and mediation (.4);	0.40	\$250.00
9/25/2023	Timothy Burns	Travel to New York from Madison for insurance hearing and mediation [billed at 1/2 travel rate] (4.0);	4.00	\$1,950.00
9/25/2023	Jesse Bair	Additional analysis re recent report from the mediators (.1);	0.10	\$62.50
9/25/2023	Brian Cawley	Research ability of insurers to file Plan in bankruptcy (1.3);	1.30	\$546.00
9/25/2023	Jesse Bair	Continue preparing for Rule 2004 oral argument (1.6);	1.60	\$1,000.00
9/26/2023	Jesse Bair	Correspondence with PSZJ and T. Burns re logistics for upcoming mediation session (.1);	0.10	\$62.50
9/26/2023	Jesse Bair	Participate in hearing re the Arrowood 2004 motion, Committee derivative standing motion, and case status conference (1.8); participate in post-hearing conference with Debtor's counsel re outcome of same (.3); participate in post-hearing meeting with PSZJ re same and next-steps (.2); participate in post-hearing call with state court counsel re same (.4); participate in post-hearing conference with T. Burns re hearing outcome, follow-up, and strategy for meet and confer with Arrowood (.4);	3.10	\$1,937.50
9/26/2023	Jesse Bair	Continue preparing for hearing on the Arrowood 2004 motion (1.3);	1.30	\$812.50
9/26/2023	Timothy Burns	Continue preparing for Section 349 derivative standing hearing (3.3); participate in hearing on same, Arrowood 2004 motion, and omnibus status conference (1.8); participate in post-hearing conference with Debtor's counsel re hearing outcome (.3); participate in post-hearing meeting with PSZJ re same (.2); participate in post-hearing call with state court counsel re same (.4); participate in post-hearing conference with J. Bair re hearing outcome, follow-up, and strategy for meet and confer with Arrowood (.4);	6.40	\$6,240.00
9/26/2023	Jesse Bair	Review and respond to correspondence with Arrowood and I. Nasatir re meet and confer re the Court's Rule 2004 ruling (.2); begin preparing for meet and confer with Arrowood (.3);	0.50	\$312.50

9/27/2023	Timothy Burns	Prepare for meet and confer with Arrowood (.8); attended same and subsequent calls with Arrowood re same (3.3); attended hearing (.8); participate in portion of in-person mediation session (3.1);	8.00	\$7,800.00
9/27/2023	Jesse Bair	Participate in supplemental hearing with Judge Glenn re Arrowood 2004 discovery issues (.8);	0.80	\$500.00
9/27/2023	Jesse Bair	Prepare for meet and confer with Arrowood (.6);	0.60	\$375.00
9/27/2023	Timothy Burns	Return travel to Madison from New York [billed at 1/2 travel rate] (5.2);	5.20	\$2,535.00
9/27/2023	Brian Cawley	Participate in portion of mediation session via Zoom (2.7); draft summary of notes of mediation (.4);	3.10	\$1,302.00
9/27/2023	Jesse Bair	Participate in in-person meet and confer with Arrowood, including follow-up telephone conferences re potential resolution of discovery issues (3.3);	3.30	\$2,062.50
9/27/2023	Jesse Bair	Participate in portion of in-person mediation session (3.1);	3.10	\$1,937.50
9/27/2023	Jesse Bair	Return travel to Madison from New York [billed at 1/2 travel rate] (5.6);	5.60	\$1,750.00
9/28/2023	Jesse Bair	Review correspondence from the mediators re October mediation sessions (.1);	0.10	\$62.50
9/28/2023	Jesse Bair	Review correspondence from B. Michael re transfer settlements (.1);	0.10	\$62.50
9/28/2023	Timothy Burns	Review correspondence with the mediators and PSZJ re mediation (.1); review correspondence with J. Bair and the Diocese re Arrowood Rule 2004 meet and confer (.1); review J. Bair correspondence with the Diocese re meet and confer re consent to settle partial summary judgment motions (.1);	0.30	\$292.50
9/28/2023	Jesse Bair	Review and respond to correspondence with the Diocese re Arrowood 2004 issues and meet and confer re proposed partial summary judgment motions (.2);	0.20	\$125.00
9/29/2023	Jesse Bair	Review B. Michael correspondence with state court counsel re case update and developments (.1);	0.10	\$62.50
9/29/2023	Jesse Bair	Prepare for call with Reed Smith re case insurance issues (.2); participate in conference with Reed Smith and T. Burns re same (.8); participate in post-conference meeting with T. Burns re outcome of same and potential next-steps (.2)	1.20	\$750.00
9/29/2023	Timothy Burns	Participate in conference with Reed Smith and J. Bair re case insurance issues (.8); participate in post-conference meeting with J. Bair re outcome of same and potential next-steps (.2)	1.00	\$975.00

9/29/2023	Jesse Bair	Review Interstate letter to the Court re Interstate's improper disclosure of survivor information (.1);	0.10	\$62.50
9/30/2023	Timothy Burns	Research and analysis re insurance neutrality issues re Plan drafting (.8);	0.80	\$780.00
<b>Total Hours and Fees</b>			<b>296.20</b>	<b>\$182,575.75</b>

**EXPENSES**

<b><u>Date</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
9/11/2023	United Airlines, T. Burns (MSN-EWR Sept. 11-13)	\$832.40
9/11/2023	Delta Airlines, J. Bair (MSN-LGA Sept. 11-12)	\$976.40
9/17/2023	Uber, T. Burns (airport to hotel)	\$175.78
9/17/2023	Delta Airlines, J. Bair (MSN-LGA, Sept. 17-21)	\$967.10
9/17/2023	Hotel, T. Burns (3 nights)	\$2,181.00
9/17/2023	Travel meal, T. Burns	\$8.73
9/17/2023	United Airlines, T. Burns (MSN-EWR, Sept. 17-22)	\$701.95
9/17/2023	Travel meal, J. Bair	\$15.91
9/17/2023	Hotel, J. Bair (3 nights)	\$2,181.00
9/18/2023	Travel meal, T. Burns	\$11.90
9/18/2023	Travel meal, T. Burns	\$1.50
9/18/2023	Travel meal, J. Bair	\$9.19
9/18/2023	Travel meal, J. Bair	\$16.28
9/18/2023	Travel meal, T. Burns	\$5.84
9/18/2023	Taxi, J. Bair and T. Burns	\$62.71
9/18/2023	Travel meal, T. Burns	\$2.62
9/19/2023	Travel meal, J. Bair	\$18.32
9/19/2023	Travel meal, T. Burns	\$18.84
9/19/2023	Travel meal, J. Bair	\$20.71
9/19/2023	Travel meal, J. Bair	\$5.63
9/19/2023	Travel meal, T. Burns	\$9.79
9/19/2023	Travel meal, T. Burns	\$4.12
9/19/2023	Travel meal, T. Burns	\$12.00
9/19/2023	Airport parking, J. Bair	\$28.00
9/19/2023	Uber, T. Burns (mediation to airport)	\$97.84
9/19/2023	Uber, J. Bair (mediation to airport)	\$157.29
9/20/2023	Delta Airlines Wi-Fi Onboard, J. Bair	\$15.95
9/20/2023	Uber, T. Burns	\$117.40
9/25/2023	Delta, J. Bair (MSN-LGA, Sept. 25-28)	\$1,217.80
9/25/2023	Hotel, J. Bair (3 nights)	\$2,409.00
9/25/2023	Taxi, J. Bair (airport to hotel)	\$93.35
9/25/2023	United Airlines, T. Burns (MSN-EWR Sept. 25-28)	\$1,049.80
9/25/2023	Hotel, T. Burns (3 nights)	\$2,409.00

9/25/2023	Travel meal, T. Burns	\$4.49
9/25/2023	Travel meal, J. Bair	\$22.76
9/25/2023	Uber, T. Burns (airport to hotel)	\$140.84
9/25/2023	Delta Airlines Wi-Fi Onboard, J. Bair	\$4.95
9/26/2023	Travel meal, J. Bair	\$20.90
9/26/2023	Travel meal, J. Bair	\$27.71
9/26/2023	Travel meal, T. Burns	\$19.54
9/26/2023	Uber, J. Bair and T. Burns (hotel to courthouse)	\$31.63
9/26/2023	FedEx pkg. to T. Burns (binder)	\$159.42
9/27/2023	Airport parking, T. Burns	\$30.00
9/27/2023	Travel meal, T. Burns	\$26.72
9/27/2023	Uber, T. Burns (hotel to airport)	\$173.84
9/27/2023	Travel meal, T. Burns	\$24.36
9/27/2023	Uber, J. Bair (hotel to airport)	\$167.68
9/27/2023	Airport parking, J. Bair	\$30.00
9/27/2023	Travel meal, J. Bair	\$25.50
9/28/2023	Delta Airlines, Wi-Fi Onboard, J. Bair	\$15.95

**Total Expenses****\$16,761.44****Timekeeper Summary**

<b><u>Name</u></b>	<b><u>Title</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Brenda Horn-Edwards	Paralegal	0.70	\$360.00	\$252.00
Brian Cawley	Associate	69.70	\$420.00	\$29,274.00
Jesse Bair	Partner	21.50	\$312.50	\$6,718.75
Jesse Bair	Partner	85.20	\$625.00	\$53,250.00
Karen Dempski	Paralegal	1.40	\$360.00	\$504.00
Nathan Kuenzi	Associate	23.10	\$420.00	\$9,702.00
Timothy Burns	Partner	19.20	\$487.50	\$9,360.00
Timothy Burns	Partner	75.40	\$975.00	\$73,515.00

**Total Due This Invoice: \$199,337.19**